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August 26, 2021

Via ECF and Email (Torres NYSDChambers@nysd.uscourts.gov)

The Hon. Analisa Torres
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Neuhauser v. Bolivarian Republic of Venezuela/Case No. 1:20-CV-10342 (AT)

Dear Judge Torres:

We represent plaintiff Alexander Neuhauser ("Plaintiff") in the above-referenced action. Pursuant to the Court's July 12, 2021 Order, we write to provide the following status report:

1. On July 9, 2021, we transmitted the required documents for service directly to the United States Department of State ("U.S. DOS"), pursuant to 28 U.S.C § 1608(a)(4), by overnight Federal Express and a courtesy copy by email.
2. On July 22, 2021, the U.S. DOS confirmed by email that it received our package of documents and that it was processing the matter.
3. On August 18, 2021, the U.S. DOS informed us that that the matter had not yet been transmitted and was still being processed for delivery. In a follow up email that same day, the U.S. DOS informed us that given its experiences with similar service requests in Venezuela recently, and the steps required to coordinate delivery, that it would be unlikely for service to be completed on or before August 26, 2021.
4. Accordingly, Plaintiff respectfully requests an extension of time of sixty (60) days to effectuate service on defendant.

We are available to address any questions Your Honor may have regarding the above at the Court's convenience.

Respectfully,

/s/ Joshua H. Epstein

Joshua H. Epstein